

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

**URIEL SABBAGH, on behalf of
himself and all other similarly
situated consumers,**

Case No.

Plaintiff(s),

v.

**RESURGENT CAPITAL
SERVICES, L.P.,**

Defendant.

_____ /

NOTICE OF REMOVAL

PLEASE TAKE NOTICE that on this date, Defendant Resurgent Capital Services, L.P., (“RCS”) hereby removes the above-captioned matter to the United States District Court for the Southern District of Florida, Miami Division, from Miami-Dade County, Florida and in support thereof avers as follows:

1. RCS is a Defendant in a civil action originally filed on or about October 30, 2023, in the Circuit Court of the Eleventh Judicial Circuit in and for Miami-Dade County, Florida, titled *Uriel Sabbagh, on behalf of himself and all other similarly situated consumers v. Resurgent Capital Services, L.P.*, and docketed to Case No. 2023-025598-CA-01.

2. This removal is timely under 28 U.S.C. § 1446(b) as Defendant received service of process on November 6, 2023.

3. Pursuant to 28 U.S.C. § 1446, attached hereto are copies of all process, pleadings and orders received by Defendant in the state court action.

4. The United States District Court for the Southern District of Florida, Miami Division, has original jurisdiction over this action pursuant to 28 U.S.C. § 1331, in that Plaintiff has filed claims against Defendant alleging violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.* This Court has supplemental jurisdiction over Plaintiff's state law claims pursuant to 28 U.S.C. § 1367.

5. On this date, the Defendant provided notice of this Removal to counsel for Plaintiff and to the Circuit Court of the Eleventh Judicial Circuit in and for Miami-Dade County, Florida.

WHEREFORE, Defendant Resurgent Capital Services, L.P., respectfully removes this case to the United States District Court for the Southern District of Florida, Miami Division.

Respectfully submitted,

MESSER STRICKLER BURNETTE, LTD.

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*Counsel for Defendant Resurgent Capital
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Dated: November 27, 2023

CERTIFICATE OF SERVICE

I certify that on November 27, 2023, a true copy of the foregoing document was served on all unrepresented parties and counsel of record by electronic service and/or U.S. Mail, postage prepaid.

MESSER STRICKLER BURNETTE, LTD.

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